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MICHIGAN CHAPTER

Comments to the Michigan Agriculture Commission regarding the "Revised Draft 2014 GAAMPS for Site Selection and Odor Control for New and Expanding Livestock Facilities"
Gail Philbin, Assistant Director, Michigan Sierra Club, April 28, 2014

The Michigan Sierra Club strongly urges the Michigan Agriculture Commission to revise proposed changes to the "Revised Draft 2014 GAAMPS for Site Selection and Odor Control for New and Expanding Livestock Facilities" (Draft GAAMPS). While we applaud the recognition in the Draft GAAMPS that "The Michigan Department of Agriculture and Rural Development supports the expansion of urban agriculture and livestock production across the state," we are concerned the actual effect of the Draft GAAMPS would be to remove protection for such facilities under the Right to Farm Act while making it much easier for large operations to earn protection in agriculturally zoned areas.

Specifically, Sierra Club requests the Commission modify or drop three proposed changes:

1. The creation of a new category of livestock facility that expands Siting GAAMPS to include any number of animals, which will encompass small urban and suburban farmers like folks with a flock of backyard chickens in the city;
2. A new definition for areas not covered by the Siting GAAMPS -- primarily residential areas not zoned agricultural—that will exclude many of these same "backyard farmers" from protection; and
3. An allowance for producers in agriculturally zoned areas building facilities that house less than 500 animal units to self-assess to determine if it meets the applicable standards in these GAAMPS.

These proposed changes to the Siting GAAMPS are both counter-intuitive and contradictory. They are counter-intuitive, because they go directly against the acknowledgement in the Draft GAAMPS of what is one of the hottest trends in food in Michigan: the public demand for access to more local, healthy, sustainable food. Consumer tastes are shifting away from the intensive livestock system that generates the vast majority of the products available in stores and restaurants today. More people are going out of their way to shop at farmers markets and other local outlets because they care about the quality of the food they eat and its impact on their health and the environment. And more people are returning to a practice common a century ago of growing their own food as the best way to ensure their families have safe, healthy, sustainable meals.

The reasoning behind the Siting GAAMPS rule changes also contradicts the logic used by the state back in 1999 when it amended the Right to Farm Act to remove the power of local units of government to restrict factory farms or CAFOs (Concentrated Animal Feeding Operations) in terms of siting, size and other ways. So, on the one hand, the state is saying a local unit of government is qualified to determine what goes on within its borders concerning, say, a dozen birds in a back yard, but on the other hand, it has no say in the matter if we're talking about one million birds or thousands of cows in the neighborhood.

You can't have it both ways.

It's really hard to understand this removal of protection for an individual's backyard farm when you look at the agricultural producers who will continue to receive Right to Farm protection under the Siting GAAMPS regardless of any changes or easily earn it through the proposed self-assessment change. CAFOs are massive enterprises with thousands of warehoused animals that generate

millions of gallons of waste laden with pathogens, chemicals, antibiotics and contaminants that often end up in our waterways. There are 238 factory farms in Michigan that annually spread over two million tons of untreated livestock wastes on land. This has led to polluted groundwater and drinking water; harmful algae blooms; fish kills; closed beaches; antibiotic resistant bacteria and a host of health issues.

Taxpayer dollars in the form of federal Farm Bill subsidies already favor CAFOs over sustainable farms in Michigan, keeping prices for industrial products artificially low compared to the healthier, locally grown meat, dairy, poultry and eggs many people prefer. A report released by the Less=More coalition documents how polluting factory farms in Michigan continue to receive taxpayer subsidies despite being cited and fined for environmental violations. I am including a copy of *Restoring the Balance to Michigan's Farming Landscape* with these comments. It is also downloadable at www.MoreforMichigan.org.

By removing GAAMPs protection from small-scale efforts like the family in the city raising a handful of chickens for fresh eggs while making it easier for larger producers to meet GAAMPs standards and, thus, win Right to Farm protection, the Michigan Agriculture Commission is making it harder for citizens to have a choice in the kind of food they have access to. It is essentially taking sides in the marketplace and favoring subsidized factory farms over local citizens who simply want to grow their own food to ensure the health of their family, community and the environment.

Please let me know of your decision on this important matter.